



FARMINGTON CITY

September 6, 2013

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Paul Ziman
FHWA Utah Division
2520 West 4700 South, Suite 9A
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***Re: Farmington City's Comments on Draft Environmental
Impact Statement and Section 4(f) Evaluation for the
West Davis Corridor***

Dear Mr. Ziman:

I. GENERAL COMMENTS

Farmington City appreciates the obvious time and effort that has been invested to date in this process, but unfortunately, the DEIS falls short of the mark required by applicable law and does not provide the public with sufficient relevant information to allow meaningful feedback and discussion regarding whether such a road is needed, whether the trade-offs required are worth it and whether less damaging or more feasible and prudent alternatives have been fairly analyzed.

Farmington City has provided its comments on the West Davis Corridor ("WDC") in an effort to protect its territorial and proprietary interests from direct harm and indirect and cumulative impacts to its wildlife, water, city-owned property interests, ecosystem resources and Conservation Easements. The current preferred alignment of the Project frustrates the City's intention to remain a rural community with planned areas of functioning commercial development, will injure the quality of life of its residents, will injure the quality of the environment, will create economic losses and create other environmental injuries.

Based on the information in the DEIS, it is currently unclear whether this Project is needed at all for the Region in 2040 and it is clearly not needed by that point in time in Farmington City. The problematic road segments under the 2040 model located in the northern portion of the Study Areas are close to I-15 and are located almost exclusively on the East/West roads. Only certain discrete portions of I-15 in the Study Area appear not to meet an acceptable LOS in 2040. With the high local employment increases projected for both Davis and Weber Counties, we question whether the assumptions regarding future North/South travel demand are accurate, especially in view of the noted preferences of the younger workers in the Region to find local employment and to not become commuters. An outdated travel and

transportation paradigm may have been applied here and in the modeling, which needs to be corrected.

The Need issue is further complicated by the scope and extent of the selected Study Area. To fully understand Regional Need and to provide the most effective and efficient Regional solutions, the Study Area needs to include all of the lands East of I-15 and to the North with a connection to I-15 North of Ogden. If a Need can be demonstrated for the WDC, we also question whether Centerville, Farmington City and Kaysville should be part of the Study Area, as so little Need appears to exist there. We also believe it is critical to fully explore at least one alternative interchange located on I-15 to the North of Farmington City.

There are significant problems with the Section 4(f) Evaluation ("4(f)"). The fundamental problem is that the Farmington City Conservation Easements qualify as properties that must be protected under Section 4(f) under applicable law and they are not accorded that status, nor are they included in that analysis and Evaluation. Not only do these Conservation Easements perform significant recreational, park, open space, farmland and wildlife, waterfowl and wetland habitat functions, they are perpetually protected for those purposes and owned by the City. While the trails to, through, and around these conservation easements have been accorded 4(f) status, the properties containing the very conservation values protected by the Conservation Easements which those trails use as a destination are completely ignored. This is a serious legal flaw and makes no sense. The trails were designed and built concurrently with the establishment of the Conservation Easements they serve and the two must be considered unitary 4(f) resources. Farmington City is required by contract to protect these Conservation Easements from encroachment in perpetuity and intends to do so.

The cumulative impacts to and the direct and indirect effects on the Conservation Easement properties are also insufficiently explored in the Chapters of the DEIS designed to array and explore the impacts to and effects on parks, recreation areas, wildlife refuges, area habitat, farmland, wetlands, community cohesion, community facilities and otherwise. This is an issue separate and apart from the incorrect 4(f) legal status of these properties.

The Direct Effects Chapters represent noticeable effort by the Preparers, but generally they do not go far enough, as set forth in Section V(A) hereof. Specific comments regarding the Indirect Effect analysis are set forth in Section V(B) hereof, but that effort is fundamentally flawed due to the failure to provide an alternative-by-alternative analysis of the comparative Indirect Effects and to discern all of the Indirect Effects. The failure to adequately discuss the Indirect Effects on the Farmington City Conservation Easements and the Indirect Effects created by the preferred alignment off of those properties as they relate to the rest of Farmington City

is also problematic. Lastly, because of these problems with the Direct and Indirect Effects analysis, the Cumulative Impacts analysis fails as well. The problems with that effort are further discussed in Section V(C) hereof.

The problems with this DEIS are significant and far reaching enough that a new or revised DEIS must be undertaken before a final EIS may be prepared. The issues concerning the size of the Study Area and Purpose and Need, including the failure to rely on the current local planning for Farmington City disable not only those Sections, but the entire DEIS. The 4(f) issue created by the failure to accord the Farmington City Conservation Easements 4(f) status disables the Alternatives Analysis and the 4(f) Evaluation and forecloses the use of the Glover's Lane Alternatives.

There are issues with the Shepard Lane Alternatives, but they are far less than Glover's Lane. Further effort must be invested in the Alternatives Analysis to include the roads located in the entire corrected Study Area and allowing for full review of an alternative or alternatives that do not require the WDC. If it is concluded that a portion of the currently contemplated WDC is required based on a revised effort on the Need for the Project, then interchanges located North of Farmington City must be studied.

II. STUDY AREA

The selected Study Area is improperly drawn in several respects. The first is the decision to use I-15 as a boundary. It is clear the purpose of the Project is to find a solution to an alleged Regional set of problems and Need. Arbitrarily bisecting the Region by a North/South line at I-15 forecloses the review of the entire Regional Need and the review of all reasonable alternatives. It is also our belief that the logical terminus lies at I-15 somewhere North of 12th South in Ogden. As currently contemplated, the Project basically ends in no man's land and will not provide a complete future route through and around Ogden. To the South, even the 2040 traffic numbers show (at best) minimal Need in Farmington and Kaysville, save on I-15 North of Shepard Lane. Simply widening I-15 in this area should solve that problem and that alternative must be studied. The improperly drawn Study Area has failed to capture all of the Regional Need and has resulted in the selection of a preferred alignment that creates severe, irreversible and unnecessary impacts, because all reasonable alternatives were not reviewed.

III. ALTERNATIVES SCREENING AND SELECTION

As previously mentioned, the improper selection of the boundaries of the Study Area foreclosed the review of all reasonable alternatives, so this effort must again be undertaken. US 89, I-84 and the East/West roadways East of I-15 might well contribute to a Regional solution that does not require the WDC. In that the only Need-based problem located South of 200 North in

Kaysville in 2040 is on I-15, the focus should be on simply widening I-15 not on the Shepard Lane and Glover's Lane alternatives. If the Need for the WDC proves real, then a new Interchange must be explored near 200 North in Kaysville to connect to the undeveloped area to the North.

The geography of the Farmington/Kaysville area basically dictates this result due to the bottleneck created by the Great Salt Lake and the mountains, as there is insufficient space with existing and planned land uses to fit either of the contemplated southern interchanges. Of those two Interchanges, Glover's Lane cannot be built due to the 4(f) nature of the Farmington City Conservation Easements and while Shepard Lane does not cross those Easements, it has some traffic and design related issues such as infringement on the Business Park area, access to Lagoon and Station Park, impact to the golf course and motorist confusion. Shepard Lane is still an option, but a new interchange Alternative must be studied to the North if the WDC is actually needed. That Need must be demonstrated based on the enlarged Study Area and a full review of the potential contributions that may come from US 89, I-84 and all of the East/West roadways. The alternatives must be reviewed again with all of this in mind.

IV. PURPOSE AND NEED

The articulated Purposes are vague but generally acceptable. However, this Section and effort is fatally flawed. First, the Study Area was reduced in size to the point where it was impossible to capture the true Regional Need and to then discuss and review all of the reasonable alternatives available in the Region to meet that Need. There are also two levels of Need – regional and local. By way of example, as to Regional Need, the 2040 employment numbers for Davis and Weber Counties are high, (42% and 66% respectively). It would appear local employment opportunities are increasing and the anticipated use of I-15 for North/South commuter traffic may not come to pass. More work must be accomplished in this regard, together with a review of the preference of the younger workers in the area to work locally. Also, one of the articulated future Needs is to facilitate freight trips, yet the DEIS states that trucks will account for only 6% of the trips on the WDC in 2040. This does not make sense from a logical or a planning perspective.

A. The Project is Not Consistent with the Farmington City Plan.

It appears insufficient effort was made to understand local Needs as well. We will now turn to Farmington City as an example of that problem and a document entitled *Technical Supplemental Memo in Support of Farmington City WDC DEIS Response*, dated September 5, 2013 is attached hereto as Exhibit A.

The authors of the DEIS consistently mention the importance of City governments as part of the NEPA process (S.4, p. S-6), and state great deference is given to locally adopted General Plans and Transportation Plans. These plans constitute one of the primary reasons the WDC project was initiated (S.1, p S-1; S.1.2, p. S-5). Notwithstanding, UDOT's preferred alignment is B1 and that Alternative is not consistent with the Purpose and Need for the WDC in the Farmington. The B1 alignment is not compatible with the Farmington City General Plan, nor its Master Transportation Plan, it does not improve mobility (or safety) in this area, nor does it enhance peak-period mobility over the no action alternative. The DEIS states East/West congestion will continue to increase in the Study Area, which includes Farmington City. The B1 alternative does not provide inter-connection of transportation modes for the community, it does not sufficiently facilitate continuous pedestrian and bicycle facilities, and it does not support local growth objectives.

The Farmington City Master Transportation Plan (MTP) (back when the City supported the WDC) recommended interchanges on the WDC at 950 North and 1100 West near Glover's Lane. Alternative B1 does not. Section 1.6.2 discusses local transportation planning and delineates where local jurisdictions show elements of the Regional Transportation Plan ("RTP") in their respective plans. Sub-section 1.6.2.1 discusses conditions in Farmington, but fails to mention that the City's MTP shows local connection(s)/interchanges consistent with the "Corridor Connection" area set forth on the RTP.

The Farmington City Trails Master Plan (TMP) shows a continuous future Great Salt Lake Shoreline Trail. Alternative B1 does not fully support such a trail. In addition, this Alternative detrimentally impacts the trails that access Farmington City's Conservation Easements along the shore of the Great Salt Lake and will destroy the Conservation Easements, the Purposes for which they were entered and the numerous conservation values they are designed to protect.

The Farmington City General Land Use Plan and Zoning Ordinances, and local RDA plans supported by the County, School District, and other entities show a major 500 acre employment/mixed use center between I-15 and the UTA tracks, north of Clark Lane, and south of Shepard Lane. The DEIS incorporates old 2009 demographic data for this area (see 1.5, p. 1-11 to 1-12). In the intervening 4 years, the General Plan and Zoning Ordinances have changed. Market and demographic projections for this area have and will increase dramatically over the 2009 figures. Nevertheless, alternative B1 shows no opportunity for access to this 500 acres even though the west edge of this area is only 3/4 mile away from the B1 alignment and the City has already provided most of the right-of-way necessary to make connection

happen by carefully preserving corridors consistent with its Transportation Plan.

The B1 alternative also provides no local access to the area between 200 North in Kaysville and Parrish Lane in Centerville. The corridor bypasses west Kaysville and west Farmington and sustains the no-action deficiencies for these communities. These deficiencies are set forth in Section 1.4.2 of the DEIS for the entire Study Area and include, but are not limited to increased East/West congestion, user delay and lost productivity, inadequate connection of transportation modes, and lack of continuous pedestrian/bicycle facilities.

1. Improve Region Mobility (1.4.1, p 1-9). This will not occur for Farmington City. UDOT's preferred alignment does not show an interchange between 200 North in Kaysville and Glover's Lane and I-15/Legacy Highway in south Farmington—a distance of approximately 7 miles and no local access is proposed between the 200 North in Kaysville and Parish Lane in Centerville—a distance of approximately 10 miles. The Glover's Lane interchange on I-15 does not provide local access, only system to system mobility.

2. Automobile and freight trips. The existing Park Lane/1-15/US 89/Legacy Highway interchange represents one of the largest regional transportation hubs on the entire UDOT system. Nevertheless, UDOT's preferred alignment curtails the regional movement of automobile traffic from the WDC to this hub. For instance, for automobiles traveling southbound from Kaysville, one must travel approximately 9 miles to access this interchange, even though the interchange is physically less than two miles from the WDC. Such movements do not reduce use delay or enhance peak-period mobility. Alignment B1 does not reduce or mitigate the ever increasing congestion from the growing areas of west Kaysville and west Farmington east to I-15, because alignment B1 does not provide a second option for access to these areas.

3. Transit. Transit facilities that serve Davis County include, among other things, Front Runner commuter rail service (which was identified as an element of the preferred alignment of the 1995-1998 Western Transportation Corridor Major Investment Study (1.3.1, p. 1-6)) and several north to south bus routes, including the 470 and the 455, primarily on SR 106 in Farmington. Only four commuter rail stations exist in the Study Area, which include stations in Farmington, Layton, Clearfield, and Roy. East to west connectivity exists between the latter 3 and the B1 alignment of the WDC, but no east to west connectivity is available under the B1 alignment for the Farmington station. Such a result is untenable. The same distances apply for one attempting to access transit from the WDC and those traveling to the Park Lane interchange by automobile.

4. Safety and Emergency Vehicle Response Time. Because there is no interchange providing local access between 200 North in Kaysville and Parrish Lane in Centerville, emergency service providers must travel up to 10 to 12 miles (or more) before arriving at the scene of an accident. Such events can close down an entire facility, which would leave motorists stranded in traffic with no way out because there is no local access planned for the WDC between these two points. Such an access failure is inconsistent with traffic planning nationwide and should not be countenanced here.

5. Support local growth objectives. (See Section 1.4.1, p. 1-9). A major 500 acre regional employment/mixed use center is planned in the vicinity of I-15, US 89, Legacy Highway, and the WDC. Almost half of the acreage has already been built in the last two years, but the preferred alignment provides no access to this major Regional employment and shopping center. Three of these four facilities (I-15, US 89, and Legacy Hwy.) support this growth objective, but under the preferred alignment the WDC does not, because it passes by and provides no access to this area. The preferred alignment also provides no access to a business development site located near Glover's Lane.

6. Increase bicycle and pedestrian options. (See Section 1.3.1, p. 1-9). The Farmington TMP shows a shoreline trail running the full length of the City and with the intent to extend to points north and south, and with the potential for a multitude of access points to this trail (especially near the Farmington Bay Water Fowl Management area). Alignment B1 reduces the number access possibilities to these options. Farmington City has the highest number of developed trail miles per resident in the State. The preferred alignment limits trail opportunities under the City Master Plan and detrimentally impacts current and future trails. In the case of the Conservation Easements, it will destroy the destinations for a number of trails.

7. Cost. A proposed multi-million dollar interchange is planned on I-15 at Shepard Lane, which is identified as a phase one project on the WFRC's RTP. It is the understanding of Farmington City that the cost of this interchange is included in the overall cost of alternatives A3, A4, B3 and B4, but is not incorporated as part of the cost of the other alternatives (including UDOT's preferred alignment)¹. This misguided methodology skews the cost

¹ 1) Shepard alternative includes a local access interchange on the alignment between the D&RG and I-15 + a Shepard Lane interchange (serves both I-15 and Shepard alignment) + local access to Park Lane from the Shepard Lane alternative. These "improvements" are all reflected in the EIS cost estimate, but it is actually an independent project slated for construction in phase 1 of the WFRC Long Range Plan.

2) Glovers Lane alternative includes NO local access to Farmington as a part of its cost estimate. To make it an apples to apples comparison, you must add the cost of the Shepard Lane interchange, which is on the WFRC Long Range Plan (Phase I) with a price tag of \$73 million or subtract it from the cost of the Shepard Lane alternatives.

(http://www.wfrc.org/new_wfrc/UnifiedPlan/Unified%20Plan%20Booklet%20Web%20Version%20Final%206%20Aug.%202013.pdf – see page 36, 6th line up from bottom of pg) + the cost of a local access interchange in the Mink Farm area (perhaps \$20-30 million).

figures in favor of the remaining alternatives A1, A2, B1, and B2 (Table S-3, p. S-22; Table S-5, p. S-24).

The value of the Conservation Easements to Farmington City is irreplaceable. There is no mention of how or what must be paid to the City in the Glover's Lane cost figures, nor is the cost of mitigation included, should these Conservation Easements be taken. It is Farmington City's opinion that these losses cannot be mitigated.

B. Traffic Analysis

UDOT did not obtain or incorporate the correct land uses assumptions for Farmington. As a result, all future traffic volume projections are significantly low and future traffic operations analyses elements are inaccurate.

UDOT did not meet with the City to discuss or confirm the roadway network assumptions included in Chapter 1. Several improvement assumptions are listed in Table 1-2. This table contains several errors in what was assumed for "Local Transportation Projects Included in City Master Plans" that we expect could have an impact on the modeling results. Errors include: Widening Shepard Lane (Farmington): Frontage Road to 1875 West from 2 to 4 lanes. This represents new construction on a new alignment not widening to 4 lanes. New Construction 1100 West (Farmington): Shepard Lane to 100 North; 2 Lanes. This future roadway will be at least 4 lanes, not 2. Widening Park Lane (Farmington): Main Street to 1100 West from 2 to 4 lanes. This roadway has been 4 lanes for some time with no planned improvements other than restriping. Widening Clark Lane (Farmington): I-15 to 1100 West from 2 to 4 lanes. There are no plans for this roadway to be widened to 4 lanes. The provision for a future WDC local access interchange located near 1100 West/Glovers Lane was not included. The provision for a future WDC local access interchange located on 950 North was also not included. New construction of 950 North out to the WDC was not included either.

It appears that there are additional 2040 roadway network "Improvements" that are shown in Figure 1-6 but which are not included in Table 1-2. There are also discrepancies in the roadway functional classifications depicted in Figure 1-7 within Farmington as follows: State St/Clark Lane is depicted as a collector but it should be a minor arterial; all of Shepard Lane is shown as a collector but portions are minor arterials; and 200 West is shown as an arterial, but it is a collector

The Existing Conditions Report (Technical Memorandum 06) incorrectly shows Main Street, State St, 200 West and 200 East as Arterial roads (Figure 9). Figure 10 incorrectly shows Shepard Lane as having two

lanes rather than four lanes between US-89 and Main Street. 200 West between 200 South and State Street is incorrectly shown as a two lane road instead of a four lane road.

Based on the results of the transportation analysis (Chapter 7: Transportation), it is clear that there is no advantage to any of the “A” or “B” Alternatives in comparison to the No-Action Alternative in 2040 within the Farmington City area. Likewise, there is little, if any, difference with traffic operations on Farmington’s Key Roadways and Intersections between the No-Action Alternative (2040) and the four “A” Alternatives (2040) and four “B” alternatives (2040). (See Tables 7-4, 7-5, 7-9 & 7-10)

Tables 7-4 and 7-5 indicate that the No-Action Alternative (2040) for Farmington’s Key Roadway Segments and Intersections maintains very acceptable traffic operations in 2040. This is in error as the 2013 peak hour operating conditions are already below what is being projected for 2040 under the No-Action Alternative. Tables 7-9 and 7-10 indicate little if any difference between operating conditions on Farmington’s Key Roadway Segments and Intersections between the No-Action Alternative, the four “A” Alternatives, and the four “B” alternatives.

The purpose of Technical Memorandum #19 was to compare and evaluate the Shepard Lane and Glovers Lane interchange options at the southern termini for the WDC. This comparison is misleading in that it does not take into account, discuss, or consider how the lack of “local access” to/from the WDC in the Glovers Lane option affects the comparison. The Shepard Lane option provides three connections (New East/West connection between I-15 and the D&RG trail, Shepard Lane, Park Lane) whereas the Glovers Lane option provides no local connections to Farmington.

The Conclusion Section (4.0) notes that, “The Glovers Lane option performed better than the Shepard Lane option in every measure, having higher speeds, reduced travel times, and significantly less delay.” This is an obvious yet meaningless conclusion for any option that provides no local access. This is similar to saying that an express bus is a “better” option over a local bus because it has a higher speed, lower travel time and less delay. A road with no local access (but everything else pretty much the same) will always have higher speeds, lower travel times and less delay than one with local access.

Other comments are as follows: Table 1, Average Network Speed: The description for this element includes the statement, “Higher speeds reflect better operation.” This is misleading because it assumes that the primary function of the WDC (with the Glovers Lane option) is to move vehicles past Farmington, which cannot be the case. Table 3, Minimizes Number and Size of Structures. The length of several bridge structures in the Glovers option are

clearly greater than those in the Shepard option. The greater length increases maintenance and motorists exposure to icy/snowy conditions. This is not considered. Also not considered are the significant and historically documented fog conditions that exist in the West Farmington City along the Glover's Lane alignment. This will likely produce more accidents at higher speeds.

Table 3, Provides Independent Bypass Route. There are freeway facilities all over the country that do not have an adjacent/parallel "independent bypass route." In Maryland, I-270 between I-495 and I-370 is an example of a high capacity, limited right-of-way, collector/distributor freeway corridor without an independent bypass facility. The need for an independent bypass is overstated. Table 3, Provides Local Interchange Access at Shepard Lane. The Glovers Lane option actually provides NO local access options. The statement that an "Interchange is not precluded but would remain as a planned future project" is misleading. The interchange would provide access only to I-15 with no connection/relation to the WDC. The Shepard Lane option provides an independent access point directly to/from the West Davis between I-15 and the D&RG trail. The interchange footprint/area for each option should be considered. The Glovers Lane options clearly results in the loss of a greater amount of developable land and impacts Farmington City's only light manufacturing area, which possesses valuable developable land.

In addition to the problems present in the DEIS with respect to Regional Need, the Needs of Farmington City have not received the attention they are legally due in the DEIS. This Chapter must be redone, but first the entire focus must be recalibrated based on a revised Study Area.

V. IMPACTS AND EFFECTS ANALYSIS.

A. Direct Effects Analysis:

1. Impacts Review in general. Alternative B1 creates the largest number of impacts of the B alternatives with regard to conservation easements, wetlands, wildlife habitat loss, floodplains, and also involves 20 combined impacts to Section 4(f) properties. Also, because the Direct Effects to the Farmington City conservation easements are generally ignored, the Direct Effects analysis fails. The A Alternatives suffer the same fate, for the same reason and both Alternative groups also fail for reasons that will be more specifically discussed below. It should be noted that the entire discussion of impacts appears designed to result in the forgone conclusion that Alternative B1 would be the preferred alignment. Much of the problem in this regard is due to the foreshortened or non-existent impact and effects analysis with respect to the various alternatives.

2. Land use impacts (Chapter 3): The fundamental problem with this analysis in the Southern portion of the Project is that it ignores the planning of Farmington City as discussed in Section IV(A). The main conclusion of this Chapter, which is restated throughout, is that growth will occur with or without the WDC and because of that, there is a minimal review of the actual induced growth impacts created by the WDC. As a result, the DEIS contains a limited review and discussions of the actual indirect effects and cumulative impacts, despite the fact that the DEIS also concludes “[t]he WDC would shift and affect the pace and type of some of the projected development planned by the Cities in certain locations.” (3-16) This change in type and pace of growth that will be induced by the WDC must be analyzed in detail for the public in the DEIS, so the citizens may understand the future impacts of this road and because such an approach is required by law.

In Farmington City, there are a number of detrimental impacts whose scope and impact is unknown. First, there are the issues relating to access regarding the planned business developments located near Glover’s Lane and Station Park/Shepard Lane. Also, no interchange is planned on the WDC for the entire length of the road in Farmington City, which basically leaves the west side of Farmington City as an isolated area with no access benefits provided for these properties. This road has a large footprint, will create significant noise in a formerly quiescent areas and will create many other detrimental impacts to the natural environment and to the existing uses. What are the expected impacts in this report to the existing and new developments? Will those neighborhood lots sell? Will the remaining open space be converted to other uses?

There are serious detrimental impacts to the Conservation Easements from the preferred alignment, as well as the other Alternatives that rely on the Glover’s Lane option. These qualify as 4(f) properties and must be protected as such by FHWA. Putting that issue aside for the moment, there is no review of the impacts of the preferred alignment on the values and purposes for which these Conservation Easements have been perpetually preserved. These values include open space, wetlands, wildlife habitat and refuge, farmland, parks, community cohesion, viewshed and others. One reason the Conservation Easements were acquired in concert with the adjacent and nearby approved development to provide a buffer from development, and the DEIS has selected a route for the Project that will cannibalize them. It may be that the road will ultimately destroy all of the conservation values and purposes of the Farmington City Conservation Easements, yet there is little or no review of such impacts, much less mitigation or recompense provided.

Farmington City was recently recognized by CNN/Money Magazine as the 14th most livable City in the United States. Much of this award was based on the land use plans, which clustered housing near transit opportunities. Those same land use practices created the very Conservation

Easements UDOT wishes to cannibalize for its preferred alignment. This is the sort of value the preferred alternative will strip from Farmington City, yet it is not discussed in the DEIS, nor is any mitigation or recompense for the losses provided.

3. Farmlands: (Chapter 4) at P. 4-22- Agriculture Protection Areas: Alternatives B1 and B3 have the least impacts to Agriculture Protection Areas (4-22). The DEIS states UDOT will not relocate these alternatives away from the farmlands protected by this Utah Statute, because that would move the alternatives into developed areas. The DEIS states that result would render the alternatives unreasonable and imprudent, so they may not be utilized.

The alternatives analysis here should be analogous to the one performed under Section 4(f) – of course avoiding protected farmland will require additional relocations of developed property. The whole point is to protect farmland from these types of projects because it is usually the most attractive for transportation agencies. Just because a different alternative requires more taking of developed property does not necessarily mean the alternative is unacceptable. Also, the Farmington City Conservation Easements were designed to perpetually protect certain farmland operations. These are 4(f) properties and must be avoided in favor of the use of developed property. Lastly, the farmland protected by the Farmington City Conservation Easements is ignored in the analysis, as are the impacts thereto.

4. Community Impacts (Chapter 5): As previously mentioned, the Farmington City Conservation Easements will basically be destroyed by this road, as will the benefits provided thereby to the remainder of Farmington City, such as viewshed, recreational opportunities, quality of life, community facilities and community cohesion. These Conservation Easements also function as community facilities and parks, as well as neighborhood and recreational resources, yet there is little or no mention of the significant impacts created by this alignment on the Conservation Easements and on the larger Farmington City community.

It is noted at page 5-21 that park and recreational opportunities are a benchmark and priority for the quality of life in Farmington City. At 5-24 it is noted that recreation, city parks, and open space are important to the community. As previously mentioned, the only reason the development was approved in the vicinity of the Conservation Easements was because the Conservation Easements were required to be transferred to Farmington City to facilitate preservation of each of these community resources and to perpetuate the conservation values protected under the Conservation Easements. In addition to avoiding the designation of these obvious 4(f) resources as 4(f) properties, there is little or no discussion in this Chapter of the impacts to these Conservation Easements by the road, to the resources protected by these

Conservation Easements from the road, nor to the impact the loss of these resources will work on the remainder of the Farmington community. That impact will be felt all the way to the East benches due to the impact on the viewshed and the members of the community will no longer be able to enjoy the resources they present. It is unacceptable to not include these Conservation Easements in the tables relating directly to Recreational Facilities (5-25 and 26).

The DEIS states the following at page 5-42:

“The natural beauty of the area comes from features such as The Great Salt Lake and associated wetlands. However, The Great Salt Lake Shorelands Preserve and various conservation easements are in place, which prohibit development in the flood plains and would help retain the look and feel of the impact analysis area.”

This statement will no longer be true once this road cannibalizes the Farmington City Conservation Easements. The mitigation measures suggested for community cohesion, quality of life, recreation resources and community facilities cannot mitigate the loss of these values currently protected by these Conservation Easements. Conspicuously, they are not even mentioned in the analysis, nor in the Mitigation Section (5-65 to 5-67).

Page 5-67 of the DEIS states “of these resources, the WDC action alternatives would not have any substantial adverse effects on recreation resources, community facilities, public safety, or public services and utilities.” Because of the impacts to the Conservation Easements, this is untrue as to the first two resources, as is the statement that the WDC’s impact to community cohesion and quality of life is limited to residences adjacent to the highway. As to public health and safety, the lack of access to Farmington City from the preferred alignment is potentially life-threatening. Lastly, it is unknown how or even if the Conservation Easements could possibly be managed (or even used) should this roadway be placed on them and those outcomes are not discussed.

5. Transportation (Chapter 7): As previously mentioned, the Study Area needs to be much larger and include all of the land East of I-15 to the mountains and North to I-15 above Ogden. That would allow the review of other roads within the complete regional Study Area and a review of additional alternatives to meet the actual Regional Need.

As to Local Need in Farmington, this Chapter supports the City’s contention that the problems with congestion, delay and LOS do not exist during the 2009 timeframe (7-5) and are not expected to exist in 2040. In fact, the No Action Alternative performs just as well as any of the

suggested alternatives in the area within Farmington City (7-11). The vast majority of the traffic issues within the Study Area in 2040 are located to the North of Kaysville (Figure 1-9), yet it appears no alternative interchange in that location to the North of Farmington City was given serious consideration in the DEIS.

6. Economics (Chapter 8): An inconsistency appears to be created by some of the information in this Chapter. At 8-2 it is noted that employment was up in Davis County by 61.8% and in Weber by 41.9% from 1990-2011 and the 2040 numbers demonstrate an increase of 49% for both counties. With this significant increase in employment in the area it would appear the commuter-based Need for North/South traffic has been and will continue to decline. It may be that a paradigm shift has begun to occur that will continue through 2040. The trend is toward more local employment and living, rather than a more traditional, commuter-based, suburban lifestyle. Additional work in this regard must be accomplished by the Wasatch Front Regional Council, FHWA and UDOT to ensure that roads are not being built based on the old paradigm.

Simply looking at whether the land will be converted for development and not at the impacts created by the timing of the development or changes in the type of use created by the Project is an unacceptable approach. Also, the nature of the WDC preferred alignment and the failure to provide connections to the WDC in Farmington City will have a negative impact on its growth, none of which is discussed in this document. It is hard to imagine an overall increase in property values for the Farmington City portion of the WDC Study Area due to this project (See 8-20). Rather, they are likely to decrease because of lack of access to Farmington City under the preferred alignment.

The DEIS also fails to discuss the economic impact to property and other related values due to the placement of this road directly on properties preserved as open space, on the viewshed of all of Farmington City. There is also no discussion of the type of development that will occur near the Project due to these changes in the Conservation Easement. The Conservation Easements provide significant economic value throughout the City and this is not recognized nor discussed.

Farmington City intentionally created its economic development and land use plans around the area where I-15, US 89 and the Legacy Parkway come together in the vicinity of Park Lane. The preferred alignment not only does not respect this prior planning and investment by Farmington City, it ignores it and will reduce its economic value.

7. Joint Development (Chapter 9): This entire section fails due to the fact that impacts to the Farmington City trail system are

basically ignored, as are the Conservation Easements that provide most of the destinations for the use of these trails.

8. Consideration Related to Pedestrians and Bicyclists (Chapter 10): This Chapter does not adequately discern and discuss the nature of these resources, the reason why these resources exist, the purposes they are trying to meet, nor the impacts on not only the trails, but the areas they access (the Conservation Easements). Rather than speaking in terms of impacts to these resources, the DEIS simply discusses the ability to relocate the trails. Maps showing the existing and future trails within Farmington City are attached hereto as Exhibit B with the Glover's Lane and Shepard Lane Alternatives juxtaposed upon them. This Section needs to be entirely redone with this in mind.

9. Air Quality (Chapter 11): The DEIS recognizes that the State of Utah is currently finalizing the PM_{2.5} SIP for the region where the WDC is located. This SIP is expected to be completed in 2013. Part 11.4.2 of the DEIS fails to review the Technical Support Document or TSD for the proposed PM_{2.5} SIP. This document provides the technical basis for the decisions made in the proposed PM_{2.5} SIP for this area including the emissions inventories, modeling, and control strategies. Because it is likely this Project will not be constructed until after the proposed SIP is adopted, the DEIS should have studied whether the Project will comply with the proposed PM_{2.5} emissions limitations in this area.

The MSAT's analysis only modeled alternatives A3 and B1. Both of these alternatives showed an increase in MSAT's from 3.79 in 2009 to 6.14 and 6.16 respectively. However, the other alternatives were not modeled and the reader is unable to compare or determine if other alternatives would have less of an impact from MSAT's. The same is true for the DEIS' review of greenhouse gas emissions.

Finally, the DEIS relies on the example in the preamble to the March 10, 2006 rule (71 FR 12491) requiring project level quantitative analyses for projects in non-attainment areas that will have more traffic than "125,000 average daily traffic (AADT) and 8% or more such AADT is diesel truck traffic." The DEIS goes on to conclude that because the WDC's projected traffic numbers are far below this example, the local conformity analyses is not required. The DEIS ignores the other factors in the regulations that require local conformity analyses, including: (i) New highway projects that have a significant number of diesel vehicles, and expanded highway projects that have a significant increase in the number of diesel vehicles; (ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;...(v) Projects in or affecting

locations, areas, or categories of sites which are identified in the PM₁₀ or PM_{2.5} applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.” 40 CFR §193.23(b)(1). Here, there is a proposed PM_{2.5} SIP for the area that could very well require the quantitative local analyses for PM_{2.5} that the DEIS has completely ignored.

10. Noise (Chapter 12): The impacts analysis area used to study noise impacts is vague. It states this area was the land adjacent to the proposed alternatives that could be affected by changes in noise levels. (12-1) The boundaries of this area are never defined and it is therefore unclear which areas were studied for noise impacts. Also, the impacts of noise on the purposes of and values preserved by the Farmington City Conservation Easements were never discussed and they could be severe, especially as to wildlife. Likewise, there is insufficient discussion of noise impacts on the nearby residential and other users. If the impacts to the resources that are protected by the Farmington City Conservation Easements were fairly considered from a noise standpoint, it is unlikely the Glover’s Lane could have been advanced.

11. Water Quality (Chapter 13): The DEIS completely fails to identify impacts to water quality that will be caused by construction of the project, and specifically, 7 new stream crossings in the study area. The Project will impact these streams if petroleum products or other construction-related wastes, such as cement, solvents, and or disturbed and eroded soil, are discharged into storm water runoff and/or groundwater during construction and operation. The Construction Impacts, Chapter 20, Section 20.3.4 refers the reader to the mitigation measures in Chapter 13, Section 13.4.5. This section fails to describe any mitigation measures that will be used during construction other than acquiring a Storm Water General Permit for construction activities and the requirement to adopt a Stormwater Pollution Prevention Plan.

The DEIS also contains no specifics as to where runoff is expected from the proposed WDC and where specific design features for storm water management will be placed (revegetation, erosion control measures, etc.) and more importantly, why. These features are identified in the roadway plan drawings in the appendices to the DEIS, but the water quality analysis fails to inform the public of the logic behind the decisions to locate these features where they are shown on the drawings. The DEIS should have included an estimate of potential increases in storm water runoff at these locations, the volume, and rationale for the specific design features that would minimize the discharges.

12. Ecosystem Resources (Chapter 14): There are significant problems in this area and the major one is the scope and extent of the Study Area. At page 14-12 it is telling that there is no mention of the

Farmington City Conservation Easements in the conservation areas, wildlife habitats, wetlands and water and uplands sections. This is unacceptable. At page 14-17, there is no discussion of the impact the road will work on habitat fragmentation, or on any related wildlife issues should the Great Salt Lake level rise and force wildlife inland. This would appear to be a significant wildlife mobility and fragmentation issue, yet it is not sufficiently discussed. Likewise, the other buffer areas may change and the impacts in that regard must be reviewed and discussed.

The 300 foot buffer from right-of-way adopted for noise is not acceptable for the purposes of wildlife and, again, should the Great Salt Lake increase in elevation there is no discussion of what impacts will occur. The future changes in the Great Salt Lake's elevation is also problematic for the wildlife habitat and fragmentation discussion and it is clear that no conclusive information was gathered as to the actual impact on all aspects of wildlife including invertebrates, reptiles, amphibians, fish, birds and mammals. Until these impacts are better understood, no aspect of this Project that may affect them may be undertaken. Likewise, the impacts of lighting are not well understood with respect to the status quo, nor as to impacts that may arise as the elevation of the Great Salt Lake changes.

The impacts to the conservation areas ignores the impacts to the Farmington City Conservation Easements and there is no effort to review the impacts to the Conservation Easements with respect to wildlife, wildlife habitat fragmentation, general habitat buffer zones, noise impacts, and artificial lighting in that regard for each alternative. No mitigation is suggested that will deal with these problems. Ironically, at page 14-110, the DEIS contains the suggestion that "compact development" is the desired outcome, yet the preferred alignment completely unravels Farmington City's attempt to do just that by clustering development and acquiring the Conservation Easements to perpetually preserve the open space and many other resources contained therein.

As to wetlands, Alternative B1 has the largest number of impacts to wetlands as compared to the other alternatives. The CWA guidelines specifically require that "no discharge of dredged or fill material shall be permitted if there is a *practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences.*" 40 CFR 230.10(a). Based on this provision, the applicant is required in every case (irrespective of whether the discharge site is a special aquatic site or whether the activity associated with the discharge is water dependent) to evaluate opportunities for use of non- aquatic areas and other aquatic sites that would result in less adverse impact on the aquatic ecosystem. *A permit cannot be issued, therefore, in circumstances where a less environmentally damaging practicable alternative for the proposed discharge*

exists (except as provided for under Section 404(b)(2)). Here, the agency did not do a complete wetlands delineation for the DEIS and is saving that for the Section 404 permitting process.

The agency also appears to be relying on the other B alternatives direct impacts to Section 4(f) properties as justification that this is the only practicable alternatives, because the other alternatives have significant adverse environmental consequences. However, those alternatives affect fewer Section 4(f) sites combined than does alternative B1 (notwithstanding the issue regarding the inclusion of the Farmington City Conservation Easements). Further, those alternatives have less impacts to wildlife habitat and floodplains, impacts to conservation easements, etc. The agency also did not consider impacts to the Farmington City Conservation Easements under Section 4(f). Had they done so, Alternative B1 would directly affect and significantly impact or destroy at least 2 or 3 additional Section 4(f) properties. In reality, Alternative B1 is the alternative that has the most adverse environmental consequences.

13. Floodplains (Chapter 15): This section is far too conclusory and fails to explore the impacts in detail. All the issues related to habitat and habitat fragmentation mentioned above apply here, yet the flood plains preserved in the Farmington City Conservation Easements are nowhere mentioned, nor are the impacts thereon. It should be noted that in a summary contained at page 15-21 the transverse crossings are the same for the alternatives utilizing Shepard Lane and Glover's Lane, yet the longitudinal crossings required by the Glover's Lane Alternative is over three times larger than those required by Shepard (201.2 vs. 61.8). The habitat and other wildlife related issues also require additional inquiry and more detailed discussion in the cumulative impact section.

14. Visual Resources (Chapter 18): This section is far too spare with respect to the review of the major impacts created by the preferred alignment on the visual resources of Farmington City. The Key Observation Points (KOP) do not include much of Farmington City proper and include none of the bench areas. There are an insufficient number of KOPs in Farmington City and overall and no KOPs that will deal with the issue of the magnitude of losses on and impacts to the rest of the City from the impacts on the Farmington City Conservation Easements. This Chapter must be significantly revised.

15. Irreversible and Irretrievable Commitment of Resources (Chapter 22): It is acknowledged there will be irreversible and irretrievable commitments of wetlands, farmland, wildlife habitat, together with historic, archaeological and paleontological resources, but the comparative scope of these sorts of impacts between the various alternatives is not discussed. Of greater importance is the failure to discuss the impact on the Farmington City

Conservation Easements. Farmington City is legally obligated to perpetually protect all of the conservation values and purposes articulated therein, yet the preferred alignment will destroy them. Farmington City is obligated to resist this alternative by all means at its disposal and it may be that UDOT's power of eminent domain is not sufficient to allow a taking of these public interests, even if they were correctly valued.

B. Indirect Effects Analysis. Chapter 23:

As previously mentioned there is no comparative alternative-by-alternative analysis for the indirect effects on land use. The DEIS generally states the indirect effects for all of the action alternatives as a whole. The CEQ regulations, however, require the DEIS to study all indirect effects including "growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." 40 CFR 1508.8(b). The DEIS failed to do this by generalizing the analysis of some of these categories of impacts, many of which will have different impacts on the rate of change of land use in the area. For instance, the impacts to the Farmington City Conservation Easement land from alternative B1 will hasten changes to the area that will not happen as quickly under other alternatives, yet there is no analysis of the indirect effects thereon as a parcel of property, much less as property protected under 4(f). Also, if the Purposes of these Conservation Easements is frustrated by this road, which is likely, what will the ultimate use be and how will it be developed? These issues may not be ignored.

The DEIS does contain an alternative-by-alternative analysis for indirect impacts to Ecosystem Resources and Wildlife, then returns to a conclusory analysis for Farmlands and Land Use without an alternative-by-alternative analysis. The same is true for economics, community and noise. Remarkably, no induced growth issues are shown to exist until near 200 North in Kaysville (See Figure 23-1). This is simply impossible and underscores the inadequate examination of all aspects of the indirect effects was undertaken.

It is not simply about induced growth and land development, as the DEIS Chapter would have the reader believe; there are as many other elements to the inquiry as there are under direct impacts. It is also improper to eliminate the review of indirect effects East of I-15 and the lack of access into Farmington City will create significant indirect effects as well by inhibiting growth. There will also be significant, yet undisclosed indirect effects to social resources, recreation resources, community facilities, public safety and security, public facilities and services, transportation, bicyclists and pedestrian resources and visual resources.

Farmington City hereby adopts the comments provided by the United States Department of the Interior dated August 14, 2013 with respect to the many failures to review impacts and effects to Ecosystem Resources and otherwise.

C. Cumulative Impacts Analysis (Chapter 24):

Cumulative impacts include the direct and indirect impacts to the area combined with reasonable foreseeable future actions. 40 CFR 1508.7. Since the indirect impacts analysis is incomplete, the cumulative impacts analysis is also distorted. This review is inadequate.

D. Mitigation Summary (Chapter 26):

This section is far too conclusory and lacks significant detail. It also fails to deal with mitigation for the impacts mentioned in the comments. By way of example, the only mitigation for the enormous magnitude of loss created by impacts to the Farmington City Conservation Easements is monetary. There is basically no mitigation for the impacts to community cohesion, quality of life, recreation resources and community facilities due to the loss of these Conservation Easements. Mitigation for trails and wildlife as well as the visual impacts to and from the loss of the Farmington City Conservation Easements are again not mentioned, nor is mitigation for the impacts to emergency services.

VI. SECTION 4(F)

The DEIS was required to treat the Farmington City Conservation Easements as Section 4(f) properties. The federal guidance on the topic supports this argument. (See Section 4(f) Policy Paper July 20, 2012). In a letter from Vincent Izzo on behalf of the WDC Project Team to Dave Millheim, City Manager of Farmington City dated April 27, 2012, Mr. Millheim was asked a series of questions based on this Policy Paper. Mr. Millheim responded to these questions in a letter dated May 11, 2012, which response is attached hereto as Exhibit C. A review of these responses reveals that these Conservation Easements perform all of the functions typically associated with 4(f) properties.

For instance:

“Each easement, as expressly stipulated therein, possesses unique and sensitive natural scenic, open space, wildlife, farmland, floodplain, and/or wetland conservation values, and was recorded for the purpose of preserving and maintaining these uses. Publicly-owned parks, recreation areas or wildlife/waterfowl refuges are allowed within the easement

area. Presently, for example, the City has an improved trail approximately 3 miles in length (and additional 1.3 miles of trail soon to be improved) available to the public across all three easements and the yet to be recorded 4th easement.

Farmington City is legally responsible and must expend public monies to enforce violations of the easement and ensure that parks, recreation areas, or wildlife/waterfowl uses of the easement are still available to the public.”

These lands were acquired to preserve the open space and the listed resources in perpetuity and the Conservation Easements were designed to enhance community cohesion, the ecosystems, recreational opportunities and the viewshed of all Farmington City. Furthermore, when determining if a Property is a Section 4(f) property, Courts have held that the Secretary “may properly rely on, and indeed should consider...local officials’ views.” *Concerned Citizens on I-90 v. Secretary of Transp.*, 641 F.2d 1, 7 (1st Cir. 1981). The views of the officials with jurisdiction is also required by the Policy Paper. (Part II, Question 1B). Those officials are at Farmington City.

Remarkably, the trails to, through, and around these Conservation Easements accorded 4(f) status in the DEIS, but the Conservation Easements were not. This makes no sense and is a clear violation of the law. As a result, no avoidance alternatives were developed, nor were any attempts made to avoid these Conservation Easements. There was also no review of the use and harm to the Conservation Easements by the Preferred Alignment and no attempt was made to minimize that harm. The fact that these tasks were not undertaken is a fatal legal flaw. The Glover’s Lane Alternative could not have moved forward in the process had these been 4(f) properties.

In addition to the fundamental 4(f) issue, there are numerous other failures regarding impact analysis and review with respect to the Conservation Easement. These lands were obtained under the Farmington City General Plan and Zoning Ordinances and were necessary to meet the requirements thereof. They are “significant” because of the numerous and varied conservation values conserved thereon and for the current and future purposes for which they were acquired. Despite the fact that these are unique and sensitive, natural, scenic, open space, wildlife, farmland, floodplain and/or wetlands, the impacts thereto were not reviewed in the Chapters of the DEIS devoted to direct effects, indirect effects, and cumulative impacts. It should also be noted that parks, recreation areas, recreation uses, community open space, educational structures, water structures, and wildlife and waterfowl refuges are allowed future uses and those resources were not reviewed as to impacts and effects either.

Specifically, Farmington Meadows Phase I and Farmington Ranches Phase VI contain wetlands and wildlife habitat with some permitted uses for pasture and farmlands. Buffalo Ranch permits a farm, but includes significant areas of wetlands and wildlife habitat. All of these easements support floodplains, natural and scenic areas, open space and are a critical aspect of the Farmington City viewshed. They also provide for recreational uses such as hiking, bicycling, bird watching and equestrian uses, which are allowed by the public and facilitated by the adjacent trails.

Other problems with this Chapter are as follows. The entire table located at 27-45 is flawed. Impacts are missing. There is a distinct preference for quantity of 4(f) impacts versus quality of 4(f) impacts, so the conclusions are skewed. Had the Conservation easements been included, the impacts could not be minimized, as the use is permanent. Because the use of the Conservation Easements was not reviewed, all of the sections discussing use of parks, use of recreational areas, use of refuges, community cohesion impacts, community facility impacts, wildlife habitat and wetland impacts and farmland impact in the DEIS are flawed.

Not only were the Farmington City Conservation Easements not accorded their rightful status as 4(f) properties, the direct effects, indirect effects and cumulative impacts to these Conservation Easements were not fairly arrayed in the respective sections of the DEIS as required. The result of this is that the 4(f) overall harm table located at 27-36 is inaccurate and the preferred alignment cannot be said to create the least overall harm. This conclusion as to 4(f) is exacerbated by the failure to review and compare the impacts to the Conservation Easements vis-à-vis the other Alternatives in the DEIS.

It should be noted that the same treatment is accorded The Nature Conservancy (TNC) Conservation Easements, which are interspersed with the land acquired by the URMCC. These properties were acquired as a block, at essentially the same time and perform the same functions with respect to protection of the ecosystem, preservation of open space and many of the other natural resources protection performed by the Farmington City Conservation Easements. Despite that, the TNC Easements are not considered 4(f), even though the URMCC properties are. This is another serious flaw.

VII. CONCLUSION

In view of the many problems and issues set forth in detail herein and summarized in the General Comments in Section I, Farmington City requests the DEIS be revised in accordance with these comments and then re-issued. First, however, all of the relevant information must be assembled and analyzed.

We look forward to continuing to work with the local, state and federal officials involved in this Project.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Dave Millheim", with a stylized flourish at the end.

Dave Millheim
City Manager

1247291

EXHIBIT A



FARMINGTON CITY

SCOTT C. HARBERTSON
MAYOR

JOHN BILTON
CORY R. RITZ
CINDY ROYBAL
JIM TALBOT
JAMES YOUNG
CITY COUNCIL

DAVE MILLHEIM
CITY MANAGER

To: FHWA

From: David E. Petersen, Community Development Director

Date: September 5, 2013

SUBJECT: **Technical Supplemental Memo in Support of Farmington City
WDC DEIS Response**

The purpose of this memo is to supplement Farmington City's response to the WDC DEIS. It provides comments specific to narrative, figures, tables, etc. in support of, but not explicitly set forth in the response.

1. The Farmington Master Transportation Plan (MTP) is "correctly" referenced in Section 1.6.2.1 (p 1-6). However, it should be emphasized that Farmington adopted the 2009 MTP in such a manner because at the time UDOT informed Farmington that any similar alignment to the now Shepard Lane alternative was not an option. And Farmington officials did not want the DRG&W option, which at the time was UDOT's preferred alignment. This matter was later set straight as to the City's preferred alignment (the Shepard Lane alternative) by resolution. Attached is the 2009 Roadway Functional Classification Plan, which is part of the Farmington City MTP.
2. Corridor maps RD1-01, RD1-02, RD1-03 show no future interchanges on the Glover Lane alternative, this is inconsistent with the Farmington City MTP.
3. Table 24-1 (p. 24-10) does not include the South Davis Corridor Transit Study.
4. Access to the Davis County owned "Sheep Road" is blocked south of Glover's Lane by the Glover's Lane alignment (RD1-01). Although access to this corridor is provided further south via a proposed local street from 650 West, it appears that the Glovers Lane option will forever preclude the County road as a viable north to south corridor in the future. This is one of the few continuous north to south routes in this geographically narrow area of the County that does not impact wetlands. Losing a corridor like this, in an increasingly urbanizing area, will detrimentally impact growth in Farmington City. It also is not identified in the "Other North-South Corridors" in 27.5.2.5 (p. 27-28).
5. The DEIS suggests that the US 89 corridor does not serve areas west of I-15 and therefore does not meet the purpose and need for the project (27.5.24, p. 27-27 and 27-28). However, in Farmington, the US 89 corridor connects to the Park Lane interchange, and directly impacts areas west of I-15.

6. Davis School District's major transportation facility for school busses for south Davis County is located in Farmington. Did the DEIS account for the need to enhance local traffic patterns for this facility?
7. Section 1.7.5 (p. 1-29) discusses the lack of east/west bicycle facilities in the Study Area, yet some of these east/west facilities exist in Farmington. Nevertheless, the Glovers's Lane alternative compromises one of these east/west facilities planned for the future. Attached is the Farmington City Trails Master Plan.
8. The possible need for local BRT/light rail is not discussed when it could have been (p. 2-40).
9. In describing the Glover alternatives, the DEIS fails to mention that these options are not consistent with the Farmington MTP in that they do not allow 1100 West (a major collector) to connect to Glover's Lane—another major collector (2.2.6 (beginning p. 2-55, and elsewhere).
10. Thus far, the Glovers Lane alignment is not designed to accommodate an interchange at 1100 West and the WDC, even though the DEIS acknowledges that this is in the future plan for the City.
11. Table 24-2 (p. 24–13) identifies a new “school” but it should be mentioned that this is a “high school”; also as this table describes growth in other municipalities it reported anticipated dwelling units related to those cities, but not in Farmington. It is anticipated that Farmington will add another 3,430 units in west Farmington by 2040—this number should be added to the table. Attached are updated demographic tables for Farmington City.
12. Section 26.4.5 (p. 26-7) regarding “Mitigation Measures for Impacts to Public Health and Safety” fails do mention that the lack of local access to the Glover's Lane Alignment in Farmington and southwest Kaysville will severely compromise emergency and public safety operations.
13. Updated employment data from Farmington City will increase 2040 projections more than shown on Chart 1-1 (1.5.2) (p 1-12). Attached are updated demographic tables for Farmington City.
14. Figure 1-5 significantly underestimated employment growth. West Farmington may experience employment totals up to 27,000 people. Attached are updated demographic tables for Farmington City.
15. Figure 3-2 shows the existing Station Park area as “open space” when almost 950,000 s.f. of commercial and 200,000 s.f of office is now built, occupied, and/or under construction.

16. Figure 23-2 Developed Land map (2005) is not accurate.
17. Figure 23-3 Developed Land map (2030) is not correct. It still shows, among other things, the Station Park area as "Agriculture". Attached is the future Land Use Plan/General Plan map for Farmington City.
18. Trail Mitigation Measures in 10.4.5 and 26.9 do not address Farmington Creek trail or the Haight Creek Trail in the Hunters Creek subdivision. The Glovers Lane Alignment prevents these trails from connecting to trails in Farmington Bay and the Great Salt Lake Shoreline Trail.
19. Figure 13-1 ("Water Bodies and Watersheds") is missing some of the Creeks in Farmington City.
20. The DEIS states that the land use impact analysis area encompasses existing and planned land-use patterns (3.1 (p. 3-1)—but it did not accurately do so in Farmington City.
21. Figure 5-2 ("Subdivisions and Neighborhoods") is out of date.
22. Figure 5-5 ("Non-school Community Facilities") does not show the County Fairgrounds or Justice Complex (and jail); and it is missing a church.
23. Figure 5-6 ("Schools") shows an extra school in west Farmington City that does not exist.
24. The Bangerter farm was not adequately addressed (Section 26.3.3, p. 26-5).
25. Figure 4-4 ("Croplands") is not completely accurate.
26. Glovers Lane Alignment makes the Buffalo Ranch difficult to operate as agriculture or ranch property (RD1-02).
27. The wetlands depicted in Farmington City's office park area are not as widespread as shown on Figure 14-2.
28. Sections 2.4.2.2 and 3.3.5, and Figure 3-4 and 14.3 do not mention or illustrate the existing and soon to be recorded Hunter Creek's conservation easements (pg. 2-82 and 3-12).
29. Section 27.4 "Identification of Section 4(f) Resources" does not identify Farmington City's conservation easements as 4(f).
30. The Glover's Lane alignment disrupts all of the Farmington City conservation easements as shown on map RD1-02.

31. Section 2.4.2.2. shows that the Glovers Lane option would affect 173 acres of flood plain while the Shepard Lane option would impact 34 acres. Yet the DEIS states that actual impacts of flood plain functions with the Glover Lane option are considered less (p. 83). The DEIS then compares the two very different flood plains--- one an immense multi-regional flood plain, and the other---a very localized flood plain on a small creek which is the drainage tributary for an exponentially smaller area. It erroneously demonstrates that the Glovers Lane impacts (.0007% of the Great Salt Lake Flood Plain) is less than the Shepard Lane option (which impacts 100% of the Haight Creek Flood Plain). Moreover, regarding Haight Creek, it appears from the information presented that the Shepard Lane Alignment may occupy 100% of the "FEMA" floodplain, but it certainly does not occupy 100% of the remaining Haight Creek floodplain outside the FEMA designation.
32. It appears that the flood plain in the Shepard Lane alignment is much less than 34 acres (see Figures 15-3 and 15-4).
33. The bald eagle habitat is not correctly addressed along Farmington Creek (Section 14.2.2 (p. 14-4)).
34. The City overview in Section 23.5.1.2 (p. 23-9) is not correct in that it states that 1100 West (a major collector will eventually connect to Glover's Lane (another major collector) under all of the alternatives; however, it will only do so under the Shepard Lane Options---it appears that it will never do so under the Glover Options.
35. Section 23.5.1.2 (p.23-9) of the DEIS incorrectly quotes Farmington City planners as follows: 1) the 4,218 elevation mark is a "development boundary" (not "the" development boundary as referenced in the study)--and it is not the "Great Salt Lake floodplain elevation" also referenced in therein; 2) the Section also states: "Since most of the land west of Alternatives A1 - A2 and B1 - B2 is lower than this elevation, no development would occur in this area", but development can occur in this area--just at lower densities; 3) the Section further states: "Current and planned development would occur out to the location of the conservation easement the City has in place to restrict development in western Farmington near the Great Salt Lake. Therefore, Alternatives A1--A2 and B1--B2 would not induce development in this part of the Western Farmington". This is not true--it would induce development. This is a big issue for Farmington City. These alignments would unravel years of the planning efforts---these indirect and cumulative impacts are huge for the community.
36. Table 23-1 "Summary of indirect effects of the WDC by City" (p.23-14) is incomplete. More indirect impacts should be listed as conservation easement and long standing General Plan designations will likely change if the Glover's Lane alignment is chosen. It will dramatically change west Farmington.
37. Figure 23-1 ("Location of Potential Indirect Effects") should be updated to the indirect negative impacts in Farmington City related to Glover's Lane alignment.

38. In Section 23.5.2 the potential indirect effects of farmland in west Farmington City related to the Glovers Lane alignment are not discussed (p. 23-20).
39. Page 23-21 of Section 23.5.2 discusses the indirect effects on economics due to interchanges along the WDC. Farmington City is conspicuously absent from this discussion because no interchanges are planned on the Glovers Lane alignment in our community. Any interchange in Farmington City would have a positive indirect effect; however, because there is not an interchange on the Glovers Lane alignment, it is a negative economic effect for the City.
40. Page 23-22 of Section 23.5.2 states the potential indirect effects of noise are anticipated to be negligible. Notwithstanding this, in west Farmington City they will be significant in the future if the Glovers Lane alignment is chosen
41. The indirect effect of future growth in Farmington City are more certain than described in Section 23.6. If no local access is provided on the Glovers Lane alignment economic growth will be slowed.
42. Indirect impacts are very significant in Farmington City and they should be considered as an "Important Cumulative Impacts Issue", but they are not (see 24.3.1.2 (p. 24-5); and 26.21.7 (p. 26-9)).
43. Figure 2-16 does not show connections from the sidewalks and roads to the trails themselves so that bikes/peds on Shepard Lane and Clark Lane can access the trails after they are grade separated; nor is the trail crossing at Shepard Lane designed such that it also helps transition the Haight Creek Trail across the WDC.
44. Table 10-1 shows all three classes of trail facilities while Table 10-2 only shows Class 1 facilities, but it is not obvious that Table 10-2 shows only the Class 1 facilities.
45. Section 2.1.6.2 states in part: "UDOT would consider implementing the trail improvements listed below only if there is coordination and support from the local governments. The following trail improvements would be implemented by local governments and UDOT...". The meaning of this is vague. Is the intent to give notice that the local governments will have to pay for the improvements but that UDOT will actually construct those improvements along with the WDC as a betterment? Or is the intent to say that if the communities are interested in implementing certain improvements that UDOT will include those items in the WDC project budget?
46. Both unpaved and paved trails show up under the moniker of "Class 1", and some side paths along rights of way are also erroneously identified as Class 1 facilities.
47. Section 10.1, 2nd paragraph, 3rd sentence incorrectly states that both Class 2 and 3 facilities are "typically considered a bicycle 'route'..." when this is a term usually reserved for Class 3 facilities.

48. Some maps (e.g. Figure 2-16) show the Kays Creek Trail between the D&RG Trail and the WDC alignment. Other maps (e.g. Figure 10-2) show that there is a gap west of the D&RG Trail. Meanwhile, the EIS highlights that the WDC will provide a connection from the D&RG Trail to the Emigrant Trail.

ATTACHMENTS:

- A. 2009 Roadway Functional Classification Plan (part of the Farmington City MTP).
- B. Farmington City Master Trails Plan.
- C. Future Land Use Plan/General Plan map for Farmington City.
- D. Updated Demographic Tables.



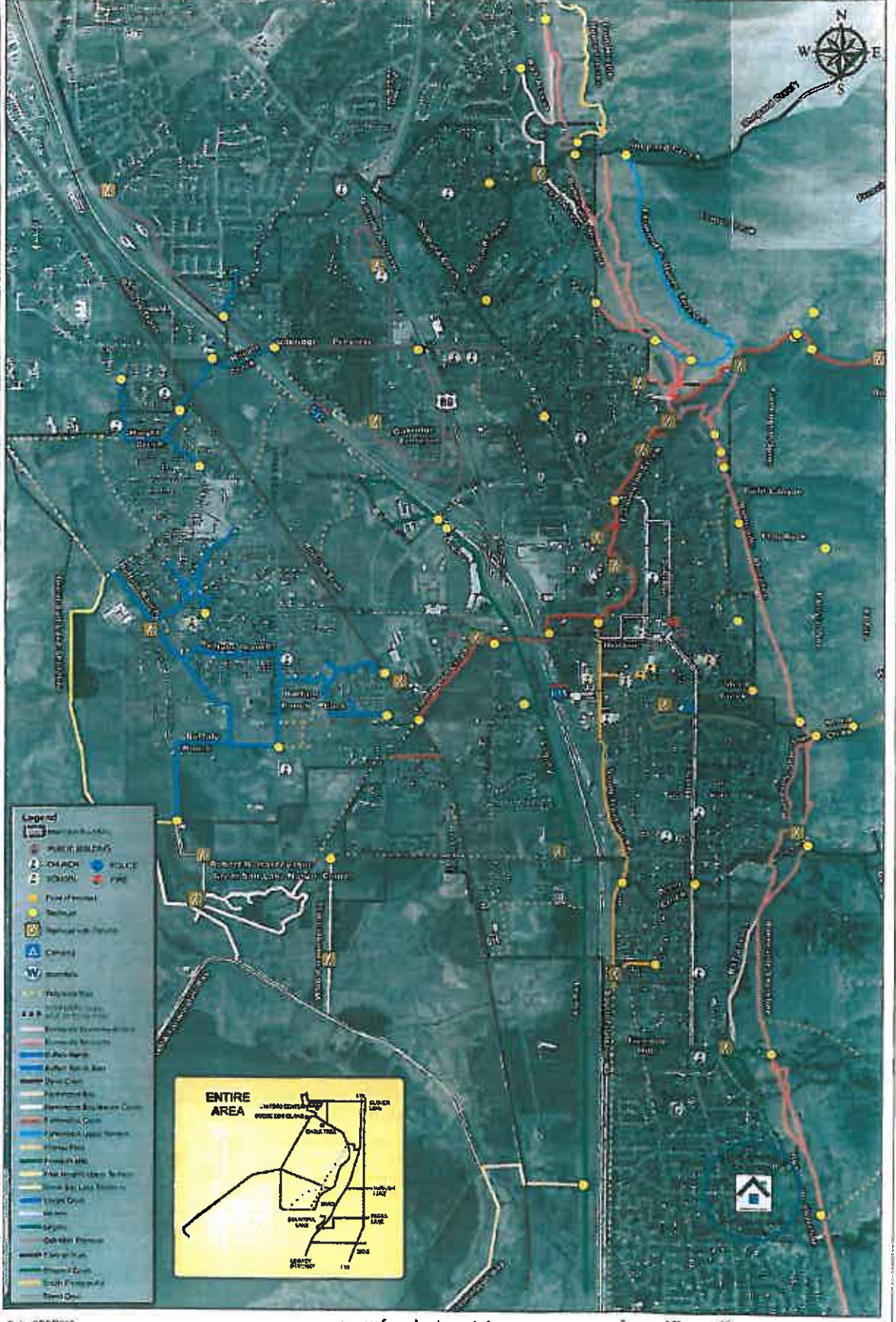
2009 ROADWAY FUNCTIONAL CLASSIFICATION PLAN

- | | | |
|--------------------------------|------------------------------------|--|
| — Arterial (106') * | Future North Legacy Connector Area | *NOTE: Roadways Are Designated As:
— Existing
- - Proposed Alignment
- - - Future Improvement |
| — Minor Arterial (100') * | Intersection Improvements | |
| — Major Collector (80') * | Farmington Boundary | |
| — Minor Collector (66') * | Future Interchange | |
| — Important Local Road (60') * | Interchange Reconfiguration | |



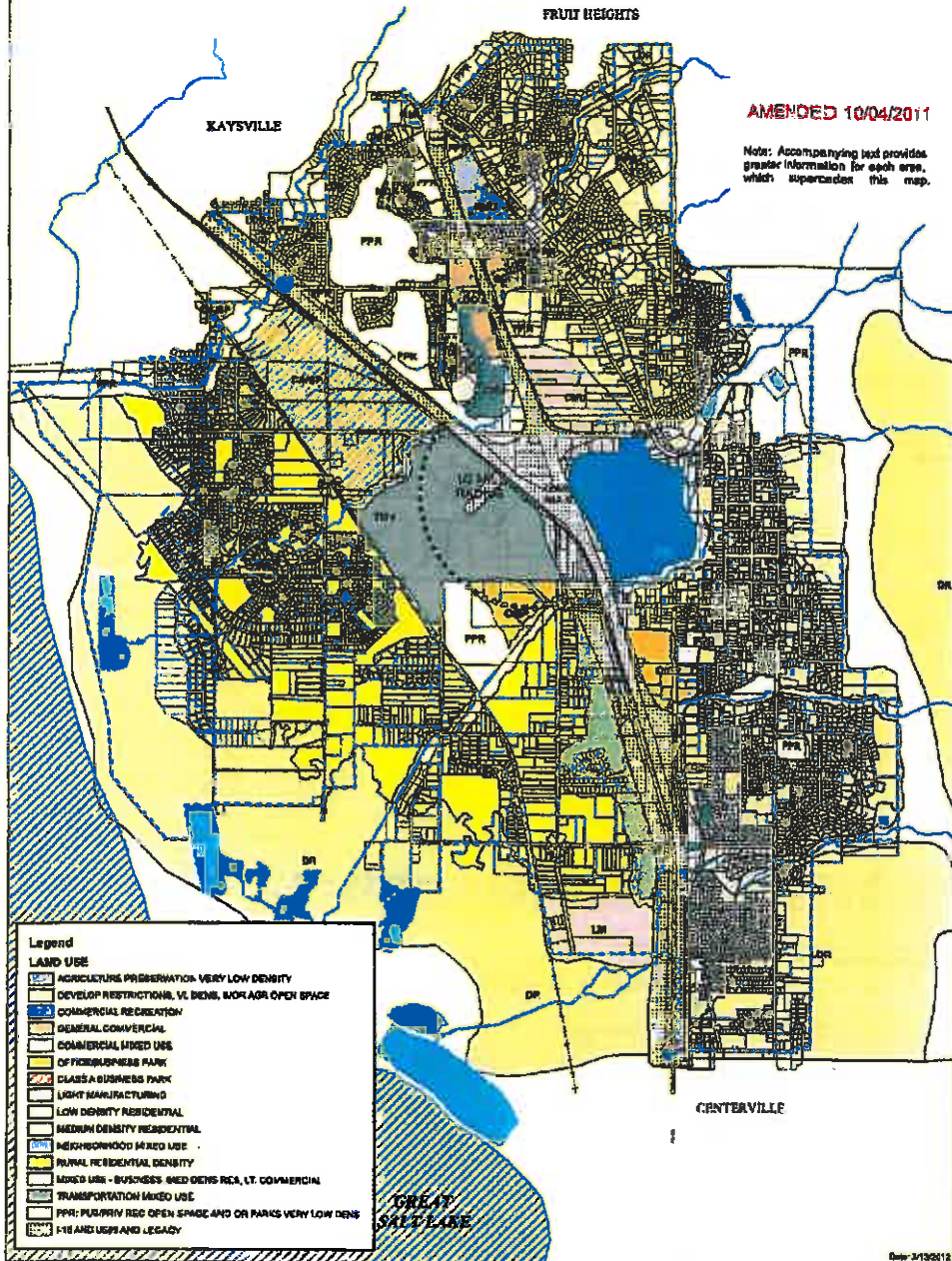
WCEC
WATER CONSERVATION ENGINEERING CONSULTANTS

0 500 1,000 2,000 2,500 Feet





GENERAL LAND USE PLAN FARMINGTON CITY



FARMINGTON

Modified 2040 Socio-Economic Data: Revised August 2013
Without Public Schools, Lagoon, Church Buildings, Fairgrounds, and Park Buildings

* See comments/questions below

Traffic Analysis Zone	Total Population	Modified 2* Total Population	Total Dwelling Units	Modified Total Dwelling Units	Total	Modified Total	Retail	Modified Retail	Industrial	Modified Industrial	Other	Modified Other	Household Size	Modified Household Size	Average Income	Notes
1- 264	3,700	31	889	9	148	9,408	400	5	0	0	48	9,249	3.74	3.39	143,874	In Fruit Heights except for about 12 Homes
267	1,341	2,122	493	636	276	469	90	188	90	0	60	281	2.97	3.34	83,350	
268	1,873	3,378	987	1,032	99	488	60	196	0	0	39	291	3.80	3.27	83,294	
269	3,399		103		8								3.41		102,514	
270	464				11	5	1	0	1	0	9	5	3.88	3.39	83,294	In Kaysville except for one home
271	858	803	220	237	1	102	3	13	2	88	18	0	3.90	3.39	83,294	
272	1,755	1,675	451	494	23	102	286	1,145	69	0	308	6,093	3.89	3.39	83,294	
273	3,520	2,395	1,100	1,065	662	7,238	307	831	75	0	531	6,562	3.20	2.27	83,350	
274	238	2,516	80	1,108	913	7,393	1,002	2,141	0	65	1,398	1,534	2.98	2.27	83,350	
275	960	1,641	300	723	2,400	3,740	1	0	1	0	6	0	3.20	2.27	83,350	
276	805	810	155	239	8	0	1	0	3	0	26	9	3.90	3.39	83,294	
277	1,011	1,385	259	410	33	9	4	0	1	0	8	63	3.89	3.39	83,294	
278	743	576	191	170	10	63	1	0	0	0	8	63	3.89	3.39	83,294	
279	0	311	0	137	800	1,229	100	40	2	0	688	1,189	2.27	2.27	83,350	
280	473	508	98	150	20	0	2	0	0	18	5	0	4.83	3.39	83,350	
281	563	610	150	180	7	12	1	0	1	12	5	0	3.89	3.39	84,003	
282	70	68	22	20	0	0	0	0	0	0	0	0	3.18	3.39	84,003	
283	187	180	58	53	150	692	14	0	17	692	119	0	3.22	3.39	84,003	
284	866	1,421	296	451	1,159	541	49	57	110	17	1,090	467	3.15	3.15	88,870	
285	1,878	1,921	574	605	1,002	1,410	43	38	95	2	864	1,368	2.92	3.15	88,870	
301	6	7	2	2	10	19	1	0	0	0	5	19	3.27	3.39	83,294	No more homes will locate here due to Bird Refug
302	573	600	119	177	309	3	16	0	5	0	286	3	4.82	3.39	83,350	
303	3,034	2,222	1,157	890	500	165	300	19	0	0	200	146	2.52	2.50	83,294	
304	1,650	1,616	484	485	1,000	256	450	143	50	48	500	65	3.41	3.33	102,514	
305	20	14	6	4	3,075	141	2,100	80	275	0	700	62	3.33	3.39	123,164	
306	1,565	1,723	536	511	100	96	38	0	10	0	52	95	2.92	3.37	88,870	
309	2,288	2,406	871	752	33	19	10	0	0	19	23	0	3.41	3.28	79,108	
Aug 2013 Estimate-->	29,296	31,001	8,871	10,530	12,665	33,496	4,883	5,050	807	944	6,975	27,502	3.30	2.94	87,859	
Original 2009 Estimate-->	29,640		9,895		11,253		3,308			917		7,026				

Comments/Questions

- 1 Do you want me to account for the approx. 12 homes TAZ 261 that are in Farmington?
- 2 This is fairly accurate as per Farmington City records, but much depends on how accurate your HH size numbers are compared to ours.

Farmington

2040 Socio-Economic Data Estimate
Selected Traffic Analysis Zones (TAZs)
Submitted 2009; Revised December 2012

Residential
75.0%

Commercial
110.0%

Other
48.0%

Residential Estimates

Non Residential Development Estimates (by square feet in 1,000s)

TAZ	Population	Revised Population	Dwelling Units	Revised Dwelling Units	House- hold Size	Retail	Revised Retail	Industrial	Revised Industrial	Other	Revised Other	Total	Revised Total
267	1,407	31	415	9	3.39	0	100	0	0	64	2,872	64	2,972
273	1,486	2,395	654	1,055	2.27	378	720	0	0	0	1,892	378	2,613
274	2,011	2,516	885	1,108	2.27	745	523	0	0	2,104	2,038	2,849	2,561
275	629	1,641	277	723	2.27	1,427	1,347	38	38	795	476	2,260	1,861
279	376	311	166	137	2.27	25	25	0	0	1,189	1,189	1,214	1,214
TOTAL	5,909	6,893	2,397	3,032		2,575	2,715	38	38	4,152	8,468	6,765	11,220

	Acres	s.f.	s.f./acre	TAZ	Acres	s.f.	s.f./acre
Millrock	22	625,000	29,070	267	85.53	2,872,336	33,583
Old Mill/Cottonwood Corp Center	72	2,500,000	34,722	273	96.15	1,892,140	19,680
				274	96.22	2,037,829	21,179
				275	86.85	476,288	5,484
				279			

Total 94 3,125,000

33,422 TOTAL 365 7,278,592 19,955

TAZ	Population	Revised Population	Dwelling Units	Revised Dwelling Units	House- hold Size	Retail	Revised Retail	Industrial	Revised Industrial	Other	Revised Other	Total	Revised Total
267	1,407	31	415	9	3.39	0	159	0	0	64	9,249	64	9,408
273	1,486	2,395	654	1,055	2.27	378	1,145	0	0	0	6,083	378	7,238
274	2,011	2,516	885	1,108	2.27	745	831	0	0	2,104	6,562	2,849	7,393
275	629	1,641	277	723	2.27	1,427	2,141	38	65	795	1,534	2,260	3,739
279	376	311	166	137	2.27	25	40	0	0	1,189	1,189	1,214	1,229

TOTAL 5,909 6,893 2,397 3,032 2,575 4,316 38 65 4,152 24,626 6,765 29,007

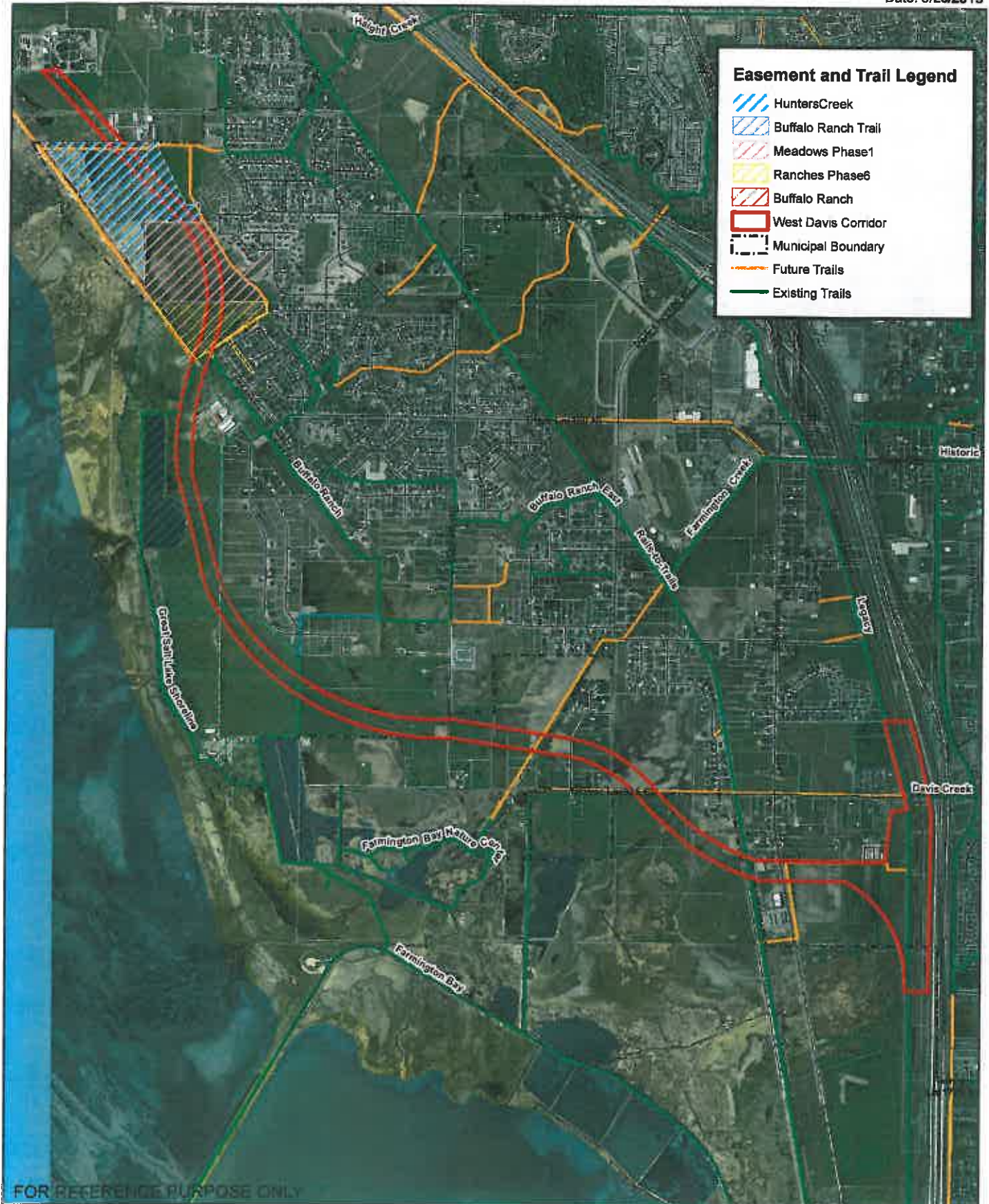
EXHIBIT B



Farmington City



Date: 8/28/2013





Farmington City



Date: 8/28/2013

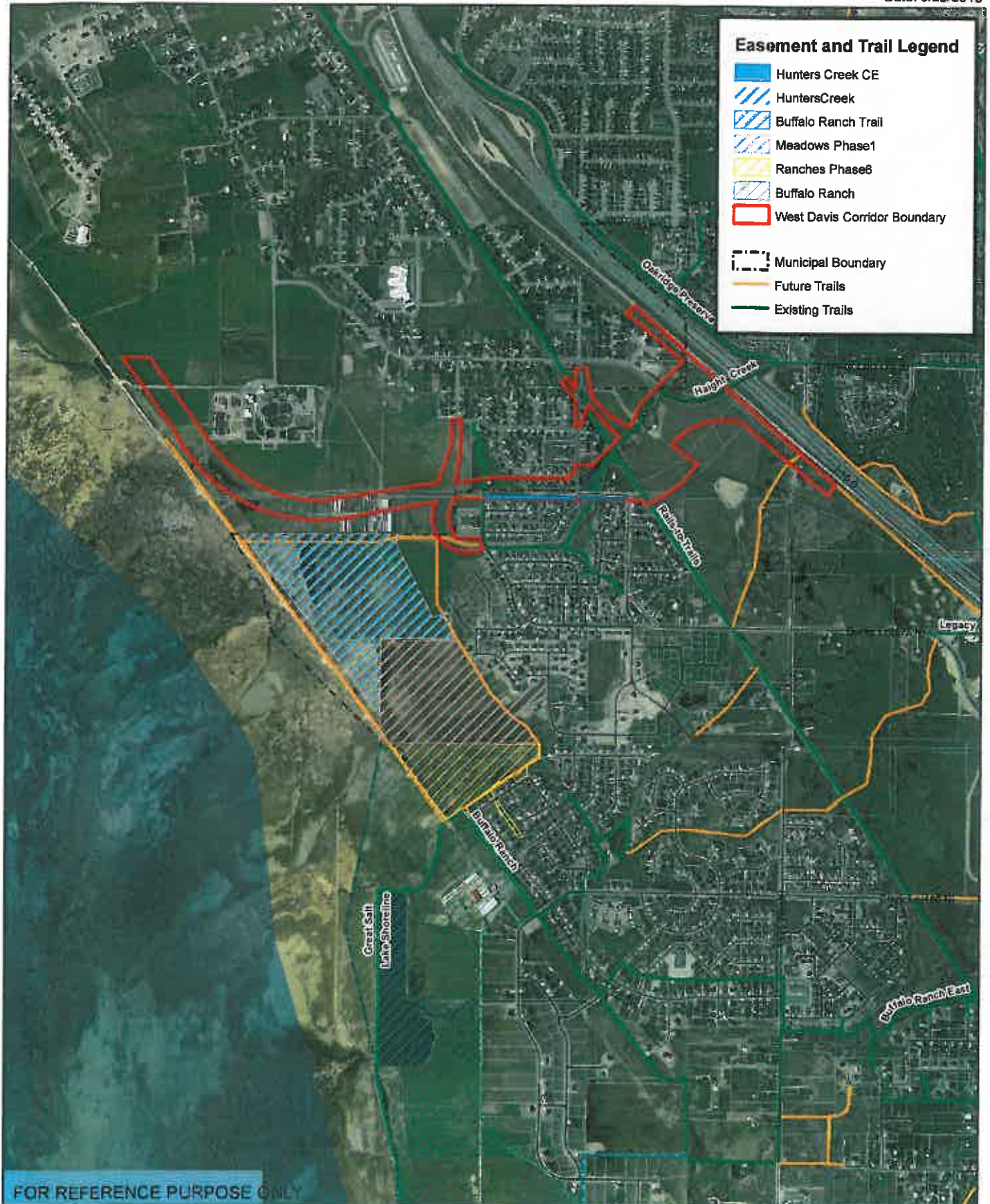


EXHIBIT C



FARMINGTON CITY

SCOTT C. HARRERTSON
MAYOR

JOHN BILTON
CORY R. RITZ
CINDY ROYBAL
JIM TALBOT
JAMES YOUNG
CITY COUNCIL

DAVE MILLHEIM
CITY MANAGER

May 11, 2012

Vincent Izzo
HDR Engineering
West Davis Corridor Consultant Project Manager
466 North 900 West
Kaysville, Utah 84037

Mr. Izzo:

I received your request for a written response to eight questions presented in your letter to me dated April 27, 2012. Thank you for taking the time to seek Farmington City's input regarding the large tracts of open space preserved on the west side of our community. Your questions are set forth below, with my response following each question:

1. Does the City of Farmington, as the public body with jurisdiction over the Farmington conservation easements, consider these land and easements, or delineated portions of them, to be publicly-owned parks, recreation areas or wildlife/waterfowl refuges? Please provide any documentation of their designation or management for these purposes.

Yes. The public owns the easements, they are under the ownership of Farmington City. The City acquired these easements through in-kind compensation of comparable value by substantially increasing in the number of lots available to the then existing property owners for their proposed developments. Our records show that three conservation easements (please see attached documents), and soon to be a fourth, encumber the ground in the path of the proposed westerly alignment of the West Davis Corridor (WDC) [note: the conservation easement for the Hunters Creek development will be recorded soon and will be similar to the others].

Each easement, as expressly stipulated therein, possesses unique and sensitive natural scenic, open space, wildlife, farmland, floodplain, and/or wetland conservation values, and was recorded for the purpose of preserving and maintaining these uses. Publicly-owned parks, recreation areas or wildlife/waterfowl refuges are allowed within the easement area. Presently, for example, the City has an improved trail approximately 3 miles in length (and additional 1.3 miles of trail soon to be improved) available to the public across all three easements and the yet to be recorded 4th easement.

Farmington City is legally responsible and must expend public monies to enforce violations of the easement and ensure that parks, recreation areas or wildlife/waterfowl uses of the easement are still available to the public (see enclosed easements). The City has taken such enforcement action in the past when debris has been dumped on the property, when property owners have desired to encroach on conservation land with buildings or unauthorized improvements, or to construct buildings beyond what the easements would allow, etc.

2. Does the City of Farmington consider these lands, or delineated portions of them to be “significant” (as defined in the quote above) as parks, recreation areas, or refuges?

Yes. The lands are significant due to their location along the shore of the Great Salt Lake, and their unique conservation values previously mentioned, and the lands are identified on the City’s Resource and Site Analysis Plan (an element of the City’s General Plan) and must be preserved for such things as parks, recreation areas or wildlife/waterfowl refuges. The lands are also significant because of the magnitude of the size of area that they encompass. They cover hundreds of acres.

3. How and by which department does the City manage or oversee these lands and terms of the easements?

AND

4. What group or organization actively manages the land for the purpose stated in the conservation easements.

The Farmington City Community Development Department, with the assistance of its legal consultants, enforces and oversees the lands in terms of the conservation easements, and the City’s Public Works and Parks and Recreation Departments, and the City’s Trail Committee, manage and oversee these lands in terms of trail use. A “Trail Boss” (or in certain circumstances more than one trail boss) is assigned by the Trails Committee to walk and inspect the trails/lands on a regular basis.

5. How are conservation easements currently used?

Recreation (trails), natural scenic open space, wildlife habitat, farmland, floodplain and wetland preservation, and green space, preservation of streams, stream corridors, and water courses.

6. How does the City view the similarities and differences among the easements (including mentions of agriculture, trails, recreation and wildlife), the City’s land use plan, and the city’s zoning plan? Are other parks or conservation areas in the City designated with the same zoning and land use as the conservation easements?

I will answer this question in three parts because it appears that one can construe the first question in this section regarding “similarities and differences” in two ways. Section A and B below deal with the first question and Section C is in response to the question in the last sentence.

A. Similarities and differences among the easements, the land use plan, and zoning [ordinance]: The easements, the City’s land use plan (or General Plan), and the city’s zoning plan (or Zoning Ordinance) are similar in purpose and function. Farmington views no differences in purposes among the three documents. They are extremely compatible.

All the easements were obtained consistent with purposes set forth in Section 11-12-010 of the Farmington City Municipal Code including, among other things, 1) “conservation of open space land, including those areas containing unique or natural features such as meadows, grasslands, tree stands, streams, stream corridors, flood walls, berms, watercourses, farmland, wildlife corridors and/or habitat, historical buildings and/or sites, archeological sites, and green space, by setting them

aside from development”; 2) “provide incentives for the creation of greenway systems and open space within the City for the benefit of present and future residents”; and 3) “create neighborhoods with direct visual and/or recreational access to constrained sensitive and conservation land”.

The purposes of this Section of the Municipal Code (as well as the easements) are consistent with goals, objectives, policies of the General Plan. These include, but are not limited to the following: 1) “The Farmington City General Plan is based on the overall goal of creating within the community a healthy, attractive, and pleasant living environment for its residents. This is the most significant element underlying the General Plan”, 2) “Maintain Farmington as a community with a rural atmosphere, preserving its historic heritage, and the beauty of the surrounding countryside”, 3) “Develop a trails system in the City which includes bike paths, jogging/hiking trails, and equestrian trails, etc.”, 4) “Explore the potential of preserving open space and greenbelt areas for recreation purposes and for use as buffer zones in developed areas where appropriate and cost efficient”, 5) “Encourage the maintenance of farmland and other open lands if they are historically or environmentally unique”, 6) “The acquisition and development of open space and park property should be a priority of the Capital Improvement Program”, 7) “Continue to conserve conservation and open space land including those areas containing unique or natural features such as meadows, grasslands, tree stands, streams, stream corridors, flood walls berms, watercourses, farmland, wildlife corridors, and/or habitat, historical buildings and/or archeological sites, and green space by setting them aside from development”, 8) “Foster an environment within the City in which agriculture lands can co-exist in urbanized areas”, 9) “Explore alternatives for preservation of agriculture lands as open space through purchase, lease, conservation easements, or otherwise”, and 10) “Maintain Farmington as a predominately low density residential community”.

As mentioned previously the easements also protect sensitive land resources identified on the City’s Resource and Site Analysis plan, and element of the City’s General Plan.

B. Similarities and differences among the easements. The three existing conservation easements include the easement recorded in conjunction with the Farmington Meadows Phase 1 Subdivision dated October, 12, 2007, the easement associated with Farmington Ranches Phase 6 dated December 22, 2005, and the easements regarding the Buffalo Ranch project dated July 3, 2003. All easements were recorded for the purpose of preserving and maintaining the same unique and sensitive natural, scenic, open space, wildlife, farmland, flood plain, and/or wetland values; and three additional values were contained in the recitals to Farmington Meadows easement: aesthetic, ecological, agriculture and recreational values [note: the other easements mention farmland but the Farmington Meadows easement does not]. It is anticipated that the soon to be established easement with the Hunters Creek subdivision will be recorded with similar purposes.

The first two easement primarily encompass wetlands and wildlife habitat with some acreage available for pasture and farm land. Meanwhile, the Buffalo Ranch Easement constitutes a horse farm, with several out-buildings. Nevertheless, this easement also includes significant areas of wetlands and wildlife habitat. All three easements include flood plains, natural and scenic areas, and open space. Public recreational opportunities including but not limited to, hiking, bicycling, bird watching, equestrian uses, etc., are also prevalent to all three easements.

C. Yes, there are other parks or conservation areas in the City designated with the same zoning and/or land use as the conservation easements. These include, but are not limited to 1) the public trail and quasi-public park in the Hunter's Creek subdivision, 2) the public park in the Spring Creek Estates subdivision, 3) the public park and public trail system in the Farmington Ranches subdivision, 4) the public trail and board walk system in the Farmington Greens Planned Unit Development, 5) the addition of public park property to the Farmington Pond park, 6) public trails and trail access/trail heads in the Deer Pointe, Shepard Heights, Oakwood Estates, Compton's Pointe, Farmington Manner, Silverwood, Farmington Ranches, Farmington Ranches East, Chestnut Farms, Eagle Creek, Miller Meadows, Deer Hollow, Sunset Hills, Mountainside, Hughes Estates, Tuscany Cove, Tuscany Village, and Willow Creek subdivisions/PUDs.

7. Are the conservation easement land, or delineated portions of them, specifically open to the public or closed/restricted?

Yes, portions of the conservation easement lands are open to the public. The easements contain the Great Salt Lake Shoreline Trail, a segment of the City's Trail Master Plan, an element of the Farmington City General Plan. Approximately, 3 miles of this trail are improved with 1.3 miles still to be developed.

8. Are there designated areas within the easement lands that are specifically planned to be developed for park, recreation, or waterfowl/wildlife refuge purposes? Please provide any documentation showing official intent to develop these lands for such purposes.

Yes, these areas include the trail system as discussed above. Enclosed for your review are photos of the trail. Copies of the easements enclosed herein also delineate the trails.

Thank you for your efforts regarding the EIS for the WDC. If you are in need of further information, please contact me at 801-939-9203 or by email at dmillheim@farmington.utah.gov, or contact our Community Development Director, David Petersen at 801-939-9211 or by email at dpetersen@farmington.utah.gov.

Sincerely,



Dave Millheim
City Manager

cc: Mayor and City Council

